

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>UNITED STATES OF AMERICA,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>\$1,399,313.74 IN UNITED STATES CURRENCY, FORMERLY ON DEPOSIT IN ACCOUNT NO. _____ 3844, IN THE NAME OF IVAN MEJIA CABAL AND CARLOS FERNANDO MEJIA CABAL, HELD AT HSBC BANK USA, NEW YORK</p> <p style="text-align: center;">Defendant <i>in rem</i>.</p>	<p>Civil case no. 08-CV-01993 Judge Scheindlin</p> <p style="text-align: center;">NOTICE OF MOTION TO DISMISS VERIFIED COMPLAINT</p>
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PLEASE TAKE NOTICE that attorneys for Claimants Iván Felipe Mejía Cabal and Carlos Fernando Mejía Cabal, relying on the Memorandum of Law submitted herewith, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order dismissing the Verified Complaint.

Dated: Roseland, New Jersey
March 25, 2008

Respectfully submitted,

s/Alan Silber

Alan Silber (AS 2370)

Attorney for Claimants Iván Felipe Mejía Cabal
and Carlos Fernando Mejía Cabal

WALDER, HAYDEN & BROGAN, P.A.

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I hereby certify that on March 25, 2008, I electronically filed a Notice of Motion to Dismiss Verified Complaint in the above captioned matter. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system. Messrs. Fine and Licitra have exchanged letters with Assistant United States Attorney Frase prior to the filing of the government's Verified Complaint which we believe satisfies the Court's requirement.

Dated: March 25, 2008

/s/ Alan Silber
Alan Silber

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